

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN

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THE ESTATE OF TONYA K. MEALMAN  
BY SPECIAL ADMINISTRATOR  
ARIC D. BURCH,

*Plaintiff,*

Case No. 21-CV-820

v.

WISCONSIN MUNICIPAL MUTUAL  
INSURANCE COMPANY, et al.,

*Defendants.*

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**PLAINTIFF'S NINTH MOTION TO COMPEL WELLPATH DEFENDANTS  
TO PRODUCE LIST OF INMATE SUICIDES  
THAT OCCURRED IN WELLPATH FACILITIES**

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Plaintiff moves this Court for an order compelling Wellpath to produce documents responsive to Plaintiff's Ninth Set of Requests for Production of Documents Nos. 3 and 4 within ten days, specifically a more narrow request of a list of all inmate suicides that occurred in facilities in the United States (including incidents like Tonya Mealmann, in which individuals did not die until after they were removed from the facility) for which Wellpath had contracted to provide healthcare from 1/1/15 to 12/31/17, an award attorneys' fees and costs, and further sanction Wellpath for its continued dilatory and vexatious conduct. FED. R. CIV. PRO. 37(a).

Plaintiff submits a contemporaneously filed brief and declaration of John H. Bradley in support of this motion.

Respectfully submitted,

Dated: 13 March 2024

/s/ John H. Bradley  
John H. Bradley  
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I CERTIFY I have in good faith conferred and attempted to confer with opposing counsel pursuant to Civil L. R. 37 in an effort to obtain the Wellpath Defendants responses to Plaintiff's above discovery requests without court action, but the parties are unable to reach an accord.

/s/ John H. Bradley